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7 Attorneys for Jose Gomez-Cabrera
8

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 * * *

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 GOMEZ-CABRERA et al,

16 Defendant.
17

2:14-cr-072-KJD-VCF

STIPULATION TO CONTINUE
SENTENCING HEARING

(Second Request)

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United
19 States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the United States
20 of America, and Rene L. Valladares, Federal Public Defender, and RAQUEL LAZO, Assistant
21 Federal Public Defender, counsel for JOSE JESUS GOMEZ-CABRERA, that the sentencing hearing
22 currently scheduled for Wednesday, June 10, 2015 at the hour of 9:00 a.m., be vacated and set to a
23 date and time convenient to this Court but no earlier than forty-five (45) days.

24 This Stipulation is entered into for the following reasons:

25 1. Since the last request for an extension of time, the parties have been able to meet
26 pursuant to U.S.S.G. section 5C1.2(5).

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1 2. Defense counsel however still requires some additional time to gather certain
2 mitigation documents from defendant. Many of these documents will need to be translated into
3 English. Additional time is also needed to draft the sentencing memorandum which was currently
4 due June 3, 2015. Once it is drafted, defense counsel will need to review it with defendant.

5 3. The defendant is incarcerated and agrees to the continuance in this matter.

6 4. The parties agree to the continuance.

7 5. This is the second request to continue filed herein.

8 DATED this 4th day of June, 2015.

9 RENE L. VALLADARES
10 Federal Public Defender

DANIEL BOGDEN
United States of Attorney

11 /s/ Raquel Lazo

/s/ Robert Knief

12 By: _____
13 RAQUEL LAZO,
14 Assistant Federal Public Defender
15 Counsel for Jose Jesus Gomez-Cabrera

By: _____
ROBERT KNIEF,
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GOMEZ-CABRERA et al,

Defendant.

2:14-cr-072-KJD-VCF

ORDER

ORDER

Based on the pending Stipulation of counsel, and good cause appearing,

IT IS FURTHER ORDERED that the sentencing hearing currently scheduled for Wednesday,
June 10, 2015, be vacated and continued to August 5, 2015 at the hour of 9:00 a .m.

DATED this 9th day of June, 2015.



UNITED STATES DISTRICT JUDGE